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12 UNITED STATES DISTRICT COURT  
13 EASTERN DISTRICT OF WASHINGTON

14 UNITED STATES OF AMERICA,

15  
16 Plaintiff,

17 v.  
18

19 RONALD CRAIG ILG,

20 Defendant.  
21  
22  
23

Case No. 2:21-cr-00049-WFN

**DEFENDANT’S MOTION TO  
CONTINUE SENTENCING  
HEARING AND ASSOCIATED  
DEADLINES**

**Without Oral Argument:**

October 25, 2022 at 6:30 pm

24  
25 COMES NOW, Defendant Ronald C. Ilg, MD (“Dr. Ilg”), by and through  
26 his attorneys of record Carl J. Oreskovich and Andrew M. Wagley of Etter,  
27 McMahon, Lamberson, Van Wert & Oreskovich, P.C., and respectfully submits  
28 the following Motion to Continue Sentencing Hearing and Associated  
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1 Deadlines. Furthermore, Dr. Ilg respectfully requests that this Motion be  
2  
3 considered without oral argument, on an expedited basis if possible.

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5 This Motion is supported by the following Memorandum of Law, as well  
6  
7 as the files and records contained herein. Furthermore, this Motion is unopposed  
8  
9 by the Government and the United States Probation Office.

### 10 **BACKGROUND**

11 On August 10, 2022, Dr. Ilg pled guilty via Plea Agreement to “Counts 1  
12  
13 and 4 of the Superseding Indictment dated February 1, 2022, charging the  
14  
15 defendant with Threats in Interstate Commerce in violation of 18 U.S.C. §  
16  
17 875(c).” (ECF No. 141 at 1.) As provided in the Plea Agreement: “Pursuant to  
18  
19 Rule 11(c)(1)(C), the United States and Defendant agree that the appropriate  
20  
21 disposition of the case falls within a range of 60-96 months custody.” (*Id.* at 3.)

22 Dr. Ilg’s Sentencing Hearing is currently scheduled for November 8, 2022.  
23  
24 (ECF No. 144.) “Pending sentencing Defendant shall be **DETAINED** pursuant  
25  
26 to this Court’s previous Order.” (*Id.* at 1 (emphasis in original).) The Defense  
27  
28 is in the process of obtaining a report from Dr. Ilg’s previous treating  
29  
30 Psychologist, Jennifer Van Wey, in support of Dr. Ilg’s forthcoming sentencing  
31  
32 request. (Wagley Decl. at ¶ 3.) Dr. Van Wey does not believe she can complete  
the report prior to the end of November. (*See id.*) Furthermore, Defense

1 Counsel has an approximate two-week trial scheduled in Spokane County  
 2  
 3 Superior Court set to commence on Monday, December 12, 2022. (*Id.* at ¶ 4.)

4 As indicated above, the Government, by and through Assistant United  
 5  
 6 States Attorney Rich Barker, and the United States Probation Office, by and  
 7  
 8 through Probation Officer Cassie Lerch, do not oppose this continuance request.  
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 10 (Wagley Decl. at ¶ 5.) The parties have conveyed and request one of the  
 11  
 12 following dates if available from the Court: Tuesday, January 24, 2023, at 10:00  
 13 a.m.; or Thursday, January 26, 2023, at 9:00 a.m.. (*Id.*) Additionally, Dr. Ilg is  
 14  
 15 in agreement with this continuance request. (*Id.* at ¶ 6.)

### 16 **POINTS & AUTHORITIES**

17  
 18 In general, “[t]he court must impose sentencing without unnecessary  
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 20 delay.” Fed. R. Crim. P. 32(b)(1). However, “[t]he court may, for good cause,  
 21  
 22 change any time limits” for sentencing. Fed. R. Crim. P. 32(b)(2). For the  
 23  
 24 reasons indicated herein, good cause exists to grant this continuance request.

25 First, a continuance is necessary for the Defense to obtain a report from Dr.  
 26  
 27 Ilg’s treating Psychologist (Dr. Van Wey) and potential other expenses  
 28  
 29 witnesses to use in support of Dr. Ilg’s sentencing arguments. Second, Defense  
 30  
 31 Counsel has a two-week trial conflict beginning on December 12, 2022. Third,  
 32  
 the Government does not oppose this continuance request and the parties have

1 conferred regarding potential dates. Fourth, Dr. Ilg is in agreement with this  
2  
3 request and will remain in custody pending sentencing.

4  
5 **CONCLUSION**

6 Based upon the foregoing, Dr. Ilg respectfully requests that this Court grant  
7  
8 Defendant's Motion to Continue Sentencing Hearing and Associated Deadlines.

9  
10 RESPECTFULLY SUBMITTED this 20th day of October, 2022.

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12  
13 By: /s/ Andrew M. Wagley

14 Carl J. Oreskovich, WSBA #12779

15 Andrew M. Wagley, WSBA #50007

16 *Attorneys for Ronald C. Ilg, MD*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on October 20, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all attorneys of record.

EXECUTED in Spokane, Washington this 20th day of October, 2022.

By: /s/ Jodi Dineen

Jodi Dineen